

BEVELOCK & FISHER LLC
Attorneys at Law

Gregory J. Bevelock, Esq.
Tel: (973) 845-2999
gbevelock@bevelocklaw.com

Fax: (973) 845-2797

14 Main Street, Suite 200
Madison, NJ 07940
www.bevelocklaw.com

Charles M. Fisher, Esq.
Tel: (973) 845-2998
cfisher@bevelocklaw.com

July 16, 2021

BY ECF

Hon. Claire C. Cecchi, U.S.D.J.
United States District Court
Martin Luther King Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: In re Ex Parte Application of JSC United Chemical Company Uralchem
Civil Action No. 2:20-cv-3651-CCC-MF

Dear Judge Cecchi:

This firm, along with Emery Celli Brinckerhoff Abady Ward & Maazel LLP and Linklaters LLP, represents petitioner JSC United Chemical Company Uralchem (“Uralchem”) in the above-referenced matter. In its June 29, 2021 Order (ECF No. 34), the Court afforded Uralchem 30 days from the entry of the Order to file an amended application pursuant to 28 U.S.C. §1782 (“Section 1782”).

We respectfully request a 60-day extension from July 29, 2021 to September 27, 2021 of the deadline to file an amended Section 1782 application, as well as a 30-day extension of Uralchem’s time to appeal, pursuant to FRAP 4(a)(5). The extensions are necessary to provide adequate time for Uralchem to meaningfully consider Court’s opinion and determine how to proceed, as well as to accommodate previously scheduled summer travel and other case commitments.

Lawton Lane Chemical Inc. consents to this request. Thank you for Your Honor’s kind attention to this matter.

Respectfully,

BEVELOCK & FISHER LLC

s/ Gregory J. Bevelock
Gregory J. Bevelock

Encls.

c : All Counsel of Record (by ECF)